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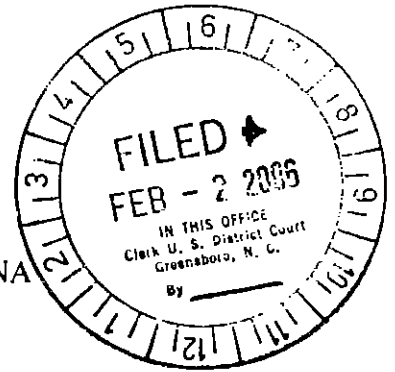
Rev. 6/03

CLERK, U.S. DISTRICT COURT
GREENSBORO, NC

UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Pro se [Non-prisoner] Complaint Form



Joanne Hairston

(Your Name)

Plaintiff,

v.

Wake Forest University
Baptist medical center

Defendant(s).

Civil Action No. _____
(to be assigned by the Clerk)

1:06CV00110

COMPLAINT

I. JURISDICTION

U.S. District Court Middle District of NC

II. PARTIES

A. Plaintiff

Name of Plaintiff:

Joanne Hairston

Address:

3450 Healy Dr #5C
WS, NC 27103

B. Defendant(s) (**Notice:** A person must be identified in subsections B and C in order to be considered as a defendant.)

Name of Defendant:

Wake Forest Medical Baptist med ctr

Current Address:

medical ctr Bldg
WS, NC 27157

- C. Additional Defendants (please provide the same information for each defendant as listed in Item B above):

DR. Douglas Kilgus
medical Center Drive
WS, NC 27157

DR Joseph ~~mohr~~
medical Center Drive
WS, NC 27157

III. STATEMENT OF CLAIM

(State here as briefly as possible the **FACTS** of your case. Do this by identifying the alleged legal wrong and by describing how each defendant named in Section II.B. and C. above is personally responsible for depriving you of your rights. Include relevant times, dates, and places. Also, you must state the basis for federal jurisdiction. In other words, why should the case be in federal court as opposed to state court. **DO NOT GIVE LEGAL ARGUMENTS OR CITE ANY CASES.** Number and set forth each separate claim in a separate paragraph.) (Attach extra sheets if necessary.)

IN Feb 1999 the Defendants placed a left hip prothesis in Mrs. Hairston. In March 2001 Mrs. Hairston was informed that because of infection the device would have to be removed. DR Kilgus removed the device Since this time Mrs. Hairston

III. STATEMENT OF CLAIM - continued.

Since this time ms. Hairston has not had the use of her left leg.

In Sept 2001 Dr. Kilgus attempted to replace the ~~g~~ prosthesis. After opening up the hip area he found that the bone structure was not conducive to another prosthesis and closed the wound. Infection set in and the wound would not heal. From 1/02 to 12/02 Dr Joseph Molnar performed more than 10 surgeries trying to clean the source of infection. In 2/03 Dr molnar found a wire that had been left in ms. Hairston's hip area from the removal of the prosthesis. The wire was corroded and embedded into ms HAIRSTON'S TISSUE.

IV. RELIEF

State briefly and exactly what relief you want from this court.

monetary relief:

2,000,000 Damages

2,000,000 Pain and Suffering

Signed this 28 day of JANUARY, 2006

Janice Karate
Signature of plaintiff

3450 Healy Dr #5C

Address

WS, NC 27105

336-760-6836

Telephone number